

Alaska Telephone Association

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David Fauske
President

James Rowe
Executive Director

July 17, 1997

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

RE: CC Docket No. 96-45, Federal State Joint-Board on Universal Service, Petition for Reconsideration

Dear Mr. Caton:

The members of the Alaska Telephone Association respectfully offer some of their concerns regarding the FCC Order of May 8, 1997 in this docket.

Thank you for your attention.

Very Truly Yours,



James Rowe

No. of Copies made 0412
List #

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Federal-State Board on) CC Docket No. 96-45
Universal Service)

Petition for Reconsideration and
Request for Clarification of the
Alaska Telephone Association

The Alaska Telephone Association (ATA), a trade association representing 22 local exchange carriers in the State of Alaska, respectfully petitions the Federal Communications Commission (FCC) to reconsider and clarify aspects of its Report and Order¹, released May 8, 1997.

I. Interstate funding at 25 percent

The Report and Order proposes to fund high cost support mechanisms through a 25 percent interstate contribution to "the difference between the cost of service defined by the applicable forward-looking economic cost method less the national benchmark"² The Telecommunications Act of 1996 clearly intended that **universal service** is a national policy and is to be funded by **federal** support mechanisms³ Further, the Act specifically requires

¹CC Docket No. 96-45, Report and Order, FCC 97-157 (May 8, 1997).

²Report and Order, para. 833

³See Telecommunications Act of 1996, §254(a)(1) which says in part, "including the definition of the services that are supported by **Federal** [emphasis added] universal service support mechanisms."

that such support shall be sufficient⁴. Unquestionably, 25 percent of the requisite amount is insufficient!

The proposal constitutes a major reduction in universal service funding from the interstate jurisdiction which currently pays 100 percent of the loop costs in excess of 150 percent of the national average. A major portion of the revenue requirement is thus shifted to the intrastate jurisdiction. Rural states, with lower population and therefore smaller market bases, will be most effected. In Alaska, between 30 and 40 million dollars will be shifted to the intrastate jurisdiction. Requiring the State to fund an intrastate universal service fund of 30 to 40 million dollars will require a surcharge of between 8 and 10 dollars per month for every access line in the State. For at least 50 percent of the residential lines this will amount to a 100 percent local rate increase.

A plain reading of §254 is that the universal service fund (USF) will finance the cost of the new definition of universal service. The States are only required to fund an intrastate USF when the State imposes additional definitions and standards⁵. The effect of the failure of the interstate jurisdiction to fully fund universal service support will precipitate the failure of the policy of universal service by shifting such significant costs to the individual ratepayer in high cost areas that rates will not be affordable⁶. The impact of this cost shift (shortfall) on a number of Alaska companies is presented in Attachment A of this Petition.

II. Limiting the amount of general and administrative overhead costs

The FCC has impaired the ability of incumbent local exchange carriers (LECs) to recover their full cost of operation by limiting a single class of expenses that may be included in universal service funding. Concerned with increasing expenses related to administration, planning and regulatory affairs, the FCC mistakenly concludes that these expenses have little to do with fostering universal service and attempts to cap them based on an average, per line formula. By its action the FCC fails to allow the full recovery of costs related to developing forward looking cost studies, pricing unbundled elements, justifying rural exemptions, planning for competition, and filing local rate cases which flow from the agency's orders.

⁴See Telecommunications Act of 1996, §254(e) which says in part, "Any such support should be explicit and sufficient to achieve the purposes of this section."

⁵ibid §254(f).

⁶ibid, §254(b)(1) "Quality services should be available at just, reasonable, and affordable rates."

Although the FCC attempts to adjust its cap to recognize the impact on small carriers, a GVNW study indicates that only the relatively smaller carriers will experience USF reductions under the FCC's plan⁷. The clear intent of Congress to limit the burden on small, rural carriers and their customers is overlooked. Necessary costs, which are not recovered due to the FCC's cap, are shifted to local subscribers causing rates to rise to unaffordable levels.

III. Continued indexed cap on the size of Universal Service Fund

The indexed cap on the size of the fund undermines the principles of universal service. It assumes that loop growth and changes in cost characteristics will be uniform throughout the whole country. It fails to take into account the diversity of the serving areas, differing regional growth rates, disparate cost of living indexes, and the occurrence of natural disasters of the country like floods in the Midwest, hurricanes along the gulf coast and earthquakes in Alaska and California that will impact the need for these funds. The only companies being kept whole are the ones that have cost and access line growth perfectly matched. It applies a proxy by substituting access line growth for actual cost. It ignores the fact that the cap was reached in the first quarter of 1997. It also creates an implicit subsidy for high cost support among the members of the pool. It is contrary to §254(e) of the Act and it will inhibit investment in infrastructure and local rate increases.

IV. Portable USF

Portable USF cannot be implemented without driving up the costs to the incumbent's remaining subscribers. A competing carrier that enters an incumbent's serving area can take the universal service funding, which is based on the incumbent's cost, for every customer it (the competitor) captures. It denies an incumbent the ability to recover costs incurred in fulfilling a regulatory mandate (carrier of last resort); a takings issue. The costs cannot be specific for one carrier if they are based on another carrier's actual costs. The revenues cannot be sufficient if it is a zero sum game with multiple eligible carriers. This practice violates the Fifth Amendment of the Constitution and §254(b)(5) and §254(e) of the Act. Its effect is to create a competitive disadvantage and deficient revenues for incumbent LECs, set the stage for a potential default of billions of dollars in government loans, increase local rates, and jeopardize the continued provision of universal service.

⁷GVNW Inc., Petition for Reconsideration, CC 96-45, Exhibit C.

V. Dial Equipment Minutes (DEM) and Long Term Support (LTS) transferred to the USF pool

Costs recovered through the USF are incurred by the Local Exchange Carrier (LEC) 24 months prior to receiving revenue from the fund. DEM and LTS recovered through Access Charges are on a current basis. Under the new USF, a LEC that makes an investment in switching upgrades cannot get cost recovery for two years. This was done without regard for the size and scope of small companies, therefore there is no transition plan to cope with revenue short falls. There is no correlation between access line growth and DEM.

Additionally, unless the indexed cap on USF is reinitialized for the increased costs of DEM and LTS, the fund will be inadequate. This is a violation of §254(b)(5) and §254(e) of the Act and its effect will be to inhibit investment in switching upgrades and create significant interim local rate increases.

VI. Time Limit for State to Develop a Cost Characteristic Model

The Order requires a state to accept the FCC's model or declare by August 15, 1997 that it will develop a forward-looking cost study for use in setting federal support for nonrural companies. The ATA supports the position Alaska Public Utilities Commission on this issue.⁸ The FCC should not limit the time for a state to develop a model.

The Alaska Telephone Association respectfully requests reconsideration or clarification of the Report and Order as discussed in this Petition.

Respectfully submitted this 17th day of July 1997.



James Rowe

Executive Director

Alaska Telephone Association

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⁸Petition for Reconsideration and Request for Clarification of the Alaska Public Utilities Commission, CC Docket No. 96-45, p.2, l.19 (July 15, 1997).

GVNW

06/24/97

ARCTIC

Estimated Impact

Forward Looking USF Procedures

Input Section

1. Company Name	ARCTIC
2. NECA Study Area Code	613001
3. Total Unseparated Revenue Requirement	3,856,428
4. Total Loops	2,279
5. Business Loops	1,476
6. Residence Loops	588
7. Current Universal Service Revenues	745,797
8. Current DEM Weighting Support	755,487
9. Current Long Term Support	236,378

New Support Computation**Business Line Support**

1. Annual Cost Per Loop	1,692
2. Business Benchmark (\$51 per Month)	612
3. Support per Loop	1,080
4. Business Loops	1,476
5. Total Supported Needed For Business Loops	1,594,313
6. Interstate Portion (25%)	398,578

Residence Line Support

7. Annual Cost Per Loop	1,692
8. Residence Benchmark (\$31 per Month)	372
9. Support per Loop	1,320
10. Residence Loops	588
11. Total Supported Needed For Residence Loops	776,253
12. Interstate Portion (25%)	194,063

13. Interstate support from new approach	592,642
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Current Support

14. Universal Service Revenues	745,797
15. DEM Weighting Support	755,487
16. Long Term Support	236,378
17. Total Current Support	1,737,662

Comparison of Support Mechanisms

18. Total Current Support	1,737,662
19. Interstate support from new approach	592,642
20. Difference	1,145,020

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08/24/97

**'Bristol Bay
Estimated Impact
Forward Looking USF Procedures**

Input Section

1. Company Name	'Bristol Bay
2. NECA Study Area Code	613003
3. Total Unseparated Revenue Requirement	2,334,323
4. Total Loops	1,974
5. Business Loops	983
6. Residence Loops	899
7. Current Universal Service Revenues	296,454
8. Current DEM Weighting Support	293,842
9. Current Long Term Support	189,351

New Support Computation**Business Line Support**

1. Annual Cost Per Loop	1,183
2. Business Benchmark (\$51 per Month)	612
3. Support per Loop	571
4. Business Loops	983
5. Total Supported Needed For Business Loops	549,425
6. Interstate Portion (25%)	137,356

Residence Line Support

7. Annual Cost Per Loop	1,183
8. Residence Benchmark (\$31 per Month)	372
9. Support per Loop	811
10. Residence Loops	899
11. Total Supported Needed For Residence Loops	728,670
12. Interstate Portion (25%)	182,168
13. Interstate support from new approach	319,524

Current Support

14. Universal Service Revenues	296,454
15. DEM Weighting Support	293,842
16. Long Term Support	189,351
17. Total Current Support	779,647

Comparison of Support Mechanisms

18. Total Current Support	779,647
19. Interstate support from new approach	319,524
20. Difference	460,123

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06/24/97

BUSH-TELL

Estimated Impact

Forward Looking USF Procedures

Input Section

1. Company Name	BUSH-TELL
2. NECA Study Area Code	613004
3. Total Unseparated Revenue Requirement	2,397,584
4. Total Loops	790
5. Business Loops	345
6. Residence Loops	443
7. Current Universal Service Revenues	244,506
8. Current DEM Weighting Support	321,815
9. Current Long Term Support	248,034

New Support Computation**Business Line Support**

1. Annual Cost Per Loop	3,035
2. Business Benchmark (\$51 per Month)	612
3. Support per Loop	2,423
4. Business Loops	345
5. Total Supported Needed For Business Loops	835,906
6. Interstate Portion (25%)	208,977

Residence Line Support

7. Annual Cost Per Loop	3,035
8. Residence Benchmark (\$31 per Month)	372
9. Support per Loop	2,663
10. Residence Loops	443
11. Total Supported Needed For Residence Loops	1,179,672
12. Interstate Portion (25%)	294,918

13. Interstate support from new approach	503,895
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Current Support

14. Universal Service Revenues	244,506
15. DEM Weighting Support	321,815
16. Long Term Support	248,034
17. Total Current Support	814,355

Comparison of Support Mechanisms

18. Total Current Support	814,355
19. Interstate support from new approach	503,895
20. Difference	310,460

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06/26/97

COPPER VALLEY

Estimated Impact

Forward Looking USF Procedures

Input Section

1. Company Name	COPPER VALLEY
2. NECA Study Area Code	613006
3. Total Unseparated Revenue Requirement	7,427,958
4. Total Loops	5,533
5. Business Loops	2,466
6. Residence Loops	2,612
7. Current Universal Service Revenues	1,201,146
8. Current DEM Weighting Support	788,541
9. Current Long Term Support	756,053

New Support Computation**Business Line Support**

1. Annual Cost Per Loop	1,342
2. Business Benchmark (\$51 per Month)	612
3. Support per Loop	730
4. Business Loops	2,466
5. Total Supported Needed For Business Loops	1,801,371
6. Interstate Portion (25%)	450,343

Residence Line Support

7. Annual Cost Per Loop	1,342
8. Residence Benchmark (\$31 per Month)	372
9. Support per Loop	970
10. Residence Loops	2,612
11. Total Supported Needed For Residence Loops	2,534,901
12. Interstate Portion (25%)	633,725

13. Interstate support from new approach	1,084,068
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Current Support

14. Universal Service Revenues	1,201,146
15. DEM Weighting Support	788,541
16. Long Term Support	756,053
17. Total Current Support	2,745,740

Comparison of Support Mechanisms

18. Total Current Support	2,745,740
19. Interstate support from new approach	1,084,068
20. Difference	1,661,672

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06/26/97

YUKON

Estimated Impact

Forward Looking USF Procedures

Input Section

1. Company Name	YUKON
2. NECA Study Area Code	613025
3. Total Unseparated Revenue Requirement	929,415
4. Total Loops	471
5. Business Loops	223
6. Residence Loops	225
7. Current Universal Service Revenues	132,456
8. Current DEM Weighting Support	253,272
9. Current Long Term Support	76,023

New Support Computation**Business Line Support**

1. Annual Cost Per Loop	1,973
2. Business Benchmark (\$51 per Month)	612
3. Support per Loop	1,361
4. Business Loops	223
5. Total Supported Needed For Business Loops	303,565
6. Interstate Portion (25%)	75,891

Residence Line Support

7. Annual Cost Per Loop	1,973
8. Residence Benchmark (\$31 per Month)	372
9. Support per Loop	1,601
10. Residence Loops	225
11. Total Supported Needed For Residence Loops	380,288
12. Interstate Portion (25%)	90,072

13. Interstate support from new approach 165,963

Current Support

14. Universal Service Revenues	132,456
15. DEM Weighting Support	253,272
16. Long Term Support	76,023
17. Total Current Support	461,751

Comparison of Support Mechanisms

18. Total Current Support	461,751
19. Interstate support from new approach	165,963
20. Difference	296,788

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06/24/97

CORDOVA
Estimated Impact
Forward Looking USF Procedures

Input Section

1. Company Name	CORDOVA
2. NECA Study Area Code	613007
3. Total Unseparated Revenue Requirement	1,850,363
4. Total Loops	2,058
5. Business Loops	804
6. Residence Loops	1,057
7. Current Universal Service Revenues	208,156
8. Current DEM Weighting Support	272,220
9. Current Long Term Support	129,768

New Support Computation**Business Line Support**

1. Annual Cost Per Loop	899
2. Business Benchmark (\$51 per Month)	612
3. Support per Loop	287
4. Business Loops	804
5. Total Supported Needed For Business Loops	230,834
6. Interstate Portion (25%)	57,709

Residence Line Support

7. Annual Cost Per Loop	899
8. Residence Benchmark (\$31 per Month)	372
9. Support per Loop	527
10. Residence Loops	1,057
11. Total Supported Needed For Residence Loops	557,163
12. Interstate Portion (25%)	139,288

13. Interstate support from new approach	196,997
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Current Support

14. Universal Service Revenues	208,156
15. DEM Weighting Support	272,220
16. Long Term Support	129,768
17. Total Current Support	610,144

Comparison of Support Mechanisms

18. Total Current Support	610,144
19. Interstate support from new approach	196,997
20. Difference	413,147

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06/24/97

INTERIOR

Estimated Impact

Forward Looking USF Procedures

Input Section

1. Company Name	INTERIOR
2. NECA Study Area Code	813011
3. Total Unseparated Revenue Requirement	8,252,765
4. Total Loops	4,297
5. Business Loops	2,172
6. Residence Loops	2,009
7. Current Universal Service Revenues	1,061,978
8. Current DEM Weighting Support	965,974
9. Current Long Term Support	769,968

New Support Computation**Business Line Support**

1. Annual Cost Per Loop	1,921
2. Business Benchmark (\$51 per Month)	612
3. Support per Loop	1,309
4. Business Loops	2,172
5. Total Supported Needed For Business Loops	2,842,252
6. Interstate Portion (25%)	710,563

Residence Line Support

7. Annual Cost Per Loop	1,921
8. Residence Benchmark (\$31 per Month)	372
9. Support per Loop	1,549
10. Residence Loops	2,009
11. Total Supported Needed For Residence Loops	3,111,113
12. Interstate Portion (25%)	777,778

13. Interstate support from new approach	1,488,341
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Current Support

14. Universal Service Revenues	1,061,978
15. DEM Weighting Support	965,974
16. Long Term Support	769,968
17. Total Current Support	2,797,920

Comparison of Support Mechanisms

18. Total Current Support	2,797,920
19. Interstate support from new approach	1,488,341
20. Difference	1,309,579

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06/24/97

KPU
Estimated Impact
Forward Looking USF Procedures

Input Section

1. Company Name	KPU
2. NECA Study Area Code	613013
3. Total Unseparated Revenue Requirement	6,816,426
4. Total Loops	10,516
5. Business Loops	4,040
6. Residence Loops	6,002
7. Current Universal Service Revenues	337,526
8. Current DEM Weighting Support	972,275
9. Current Long Term Support	273,331

New Support Computation**Business Line Support**

1. Annual Cost Per Loop	648
2. Business Benchmark (\$51 per Month)	612
3. Support per Loop	36
4. Business Loops	4,040
5. Total Supported Needed For Business Loops	146,231
6. Interstate Portion (25%)	36,558

Residence Line Support

7. Annual Cost Per Loop	648
8. Residence Benchmark (\$31 per Month)	372
9. Support per Loop	276
10. Residence Loops	6,002
11. Total Supported Needed For Residence Loops	1,657,727
12. Interstate Portion (25%)	414,432

13. Interstate support from new approach 450,989

Current Support

14. Universal Service Revenues	337,526
15. DEM Weighting Support	972,275
16. Long Term Support	273,331
17. Total Current Support	1,583,132

Comparison of Support Mechanisms

18. Total Current Support	1,583,132
19. Interstate support from new approach	450,989
20. Difference	1,132,143

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06/24/97

MUKLUK

Estimated Impact

Forward Looking USF Procedures

Input Section

1. Company Name	MUKLUK
2. NECA Study Area Code	613018
3. Total Unseparated Revenue Requirement	2,282,393
4. Total Loops	1,040
5. Business Loops	437
6. Residence Loops	603
7. Current Universal Service Revenues	502,175
8. Current DEM Weighting Support	285,302
9. Current Long Term Support	236,368

New Support Computation**Business Line Support**

1. Annual Cost Per Loop	2,195
2. Business Benchmark (\$51 per Month)	612
3. Support per Loop	1,583
4. Business Loops	437
5. Total Supported Needed For Business Loops	691,600
6. Interstate Portion (25%)	172,900

Residence Line Support

7. Annual Cost Per Loop	2,195
8. Residence Benchmark (\$31 per Month)	372
9. Support per Loop	1,823
10. Residence Loops	603
11. Total Supported Needed For Residence Loops	1,099,033
12. Interstate Portion (25%)	274,758

13. Interstate support from new approach	447,658
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Current Support

14. Universal Service Revenues	502,175
15. DEM Weighting Support	285,302
16. Long Term Support	236,368
17. Total Current Support	1,023,845

Comparison of Support Mechanisms

18. Total Current Support	1,023,845
19. Interstate support from new approach	447,658
20. Difference	576,187

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06/24/97

NUSHAGAK

Estimated Impact

Forward Looking USF Procedures

Input Section

1. Company Name	NUSHAGAK
2. NECA Study Area Code	613018
3. Total Unseparated Revenue Requirement	1,929,423
4. Total Loops	2,267
5. Business Loops	1,023
6. Residence Loops	1,144
7. Current Universal Service Revenues	315,386
8. Current DEM Weighting Support	166,586
9. Current Long Term Support	164,861

New Support Computation**Business Line Support**

1. Annual Cost Per Loop	851
2. Business Benchmark (\$51 per Month)	612
3. Support per Loop	239
4. Business Loops	1,023
5. Total Supported Needed For Business Loops	244,590
6. Interstate Portion (25%)	61,147

Residence Line Support

7. Annual Cost Per Loop	851
8. Residence Benchmark (\$31 per Month)	372
9. Support per Loop	479
10. Residence Loops	1,144
11. Total Supported Needed For Residence Loops	548,080
12. Interstate Portion (25%)	137,020

13. Interstate support from new approach	198,167
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Current Support

14. Universal Service Revenues	315,386
15. DEM Weighting Support	166,586
16. Long Term Support	164,861
17. Total Current Support	646,833

Comparison of Support Mechanisms

18. Total Current Support	646,833
19. Interstate support from new approach	198,167
20. Difference	448,666

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06/24/97

OTZ

Estimated Impact

Forward Looking USF Procedures

Input Section

1. Company Name	OTZ
2. NECA Study Area Code	613019
3. Total Unseparated Revenue Requirement	3,388,378
4. Total Loops	3,044
5. Business Loops	1,310
6. Residence Loops	1,595
7. Current Universal Service Revenues	165,349
8. Current DEM Weighting Support	573,561
9. Current Long Term Support	232,037

New Support Computation**Business Line Support**

1. Annual Cost Per Loop	1,113
2. Business Benchmark (\$51 per Month)	612
3. Support per Loop	501
4. Business Loops	1,310
5. Total Supported Needed For Business Loops	666,485
6. Interstate Portion (25%)	164,121

Residence Line Support

7. Annual Cost Per Loop	1,113
8. Residence Benchmark (\$31 per Month)	372
9. Support per Loop	741
10. Residence Loops	1,595
11. Total Supported Needed For Residence Loops	1,182,108
12. Interstate Portion (25%)	295,527

13. Interstate support from new approach	459,648
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Current Support

14. Universal Service Revenues	165,349
15. DEM Weighting Support	573,561
16. Long Term Support	232,037
17. Total Current Support	970,947

Comparison of Support Mechanisms

18. Total Current Support	970,947
19. Interstate support from new approach	459,648
20. Difference	511,299

SUMMIT TELEPHONE & TELEGRAPH COMPANY, INC.
ESTIMATED EFFECTS OF USF CAP & LOSS OF WEIGHTING
For the Test Year Ended December 31, 1995

Total Revenue Requirements	456,408
Total Loops	115
Total Cost Per Loop	3,969

Support per Business Loop

Total Cost Per Loop	3,969
Minus Business Benchmark(\$51 per loop per	612
Support needed for each Business Loop	3,357
Number of Business Loops	45
Total support needed for Business	151,054
25% - Amount from Interstate Fund	37,764
Remainder to be obtained from State USF	113,290

Support for Residence Lines

Total Cost Per Loop	3,969
Minus Residence Benchmark (\$31 per Loop)	372
Support needed for each Residence Loop	3,597
Number of Residence Loops	66
Total Support needed for Residence	237,387
25% - Amount from Interstate Fund	59,347
Remainder to be obtained from State USF	178,040

Total 25% Business & Residence Interstate Support from new approach	97,111
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Current Support

Universal Service Revenues	152,186
DEM Weighting Support	20,023
Long Term Support	77,789
Total Current Support	249,998

Comparison of Support Mechanisms

Total Current Support	249,998
Interstate support from new approach	97,111
DIFFERENCE	152,887

EXCLUDING EFFECTS OF G&A LIMITATION

Corporate Expense Allowance	Factors	1st ORDER	New 7/10/97 USF Order
Loops	115	Base	8,266
		115% of Base	9,505.90
Amount Per Loop	27.12		82.66
Reduction per Loop	0.002		
Reduction times Loops	0.23		
Computed Per Loop Amount	26.89		
115% of adjusted average	30.92		
Computed Amount per Month		3,556.20	9,505.90
12 Months		42,674	114,071
Amount per study - 1995		166,595	166,595
Short		123,921	52,524

GTE Alaska
USF Loop Cost

Input detail collected from the 1996 State Access Charge Filing

1	Total unseparated Revenue Requirement: PT 36.	10,689,203
2	Divide by Total Loops IE. Msg Tel + Special Access	21,319
3	Equals total cost per loop.	501.39
Business Lines:		
4	Cost per Loop from Ln.3	501.39
5	Minus Business Benchmark (\$51 per Mo. Est.by FCC)annualized (\$51.00*12)	612.00
6	Ln 4 - Ln 5 equals support needed per business loop	-110.61
7	Number of business loops, Year End 1996	8060
8	Total support needed for business, Ln.6*Ln.7	(891,517)
9	Business loop support requirement times 25%, for Interstate Ln.8*25%	(222,879)
Residence Lines:		
10	Cost per Loop from Ln.3	501.39
11	Minus Residence Benchmark (\$31 per Mo. Est.by FCC)annualized (\$31.00*12)	372.00
12	Ln 10 - Ln 11 equals support needed per residence loop	129.39
13	Number of residence loops, Year End 1996	9632
14	Total support needed for residence, Ln.12*Ln.13	1,246,284
15	Residence loop support requirement times 25%, for Interstate Ln.14*25%	311,571
16	Total business and residence support needed, Ln. 9 + Ln.15:	88,692
17	1996 NECA CCL Settlement Pay In Amount	45,506

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